Message

From: Langman, Michael [langman.michael@epa.gov]

Sent: 12/4/2018 5:40:55 PM

To: Ex. 6 Personal Privacy (PP)

CC: Danesh, Paymon [Danesh.Paymon@epa.gov]; Damico, Genevieve [damico.genevieve@epa.gov]

Subject: Riverview Energy Center - Link to draft permit and supporting documents

Hi Charles,

Thank you for calling me this morning to discuss your questions about the Riverview Energy Center permit.

You can find a link to the draft permit at https://permits.air.idem.in.gov/39554d.pdf. The Indiana Department of Environmental Management (IDEM) hosts the draft permit on its website. For this permit action, IDEM is the air permitting authority responsible for making a decision on the air permit application. Since IDEM is the permitting authority for the state of Indiana, I encourage you to contact IDEM if you have any specific questions on the draft permit or for permitting issues in Indiana.

As you mentioned during our call, there is a public hearing on the draft permit tomorrow, December 5, 2018. The comment period for this draft permit closes on December 10, 2018. I encourage you to review the draft permit. If you have questions or comments on the draft permit, you may submit them to IDEM either in person at the public hearing or in writing as instructed in the public notice. IDEM is required to consider and respond to all comments it receives during the public comment period. You can find more information about the public hearing and public notice on pdf pages 1-4.

The draft permit begins on page 5 of the pdf. The permit is organized into several different sections as described below.

- Section A describes the proposed source and begins on pdf page 16 (permit page 12)
- Section B lists the general requirements and begins on pdf page 38 (permit page 34)
- Section C lists applicable source wide requirements and begins on pdf page 49 (permit page 45)
- Section D includes emissions unit operating conditions and begins on pdf page 62 (permit page 58)
- Section E incorporates other federal requirements, such as New Source Performance Standards (NSPS) and National Emission Standards for Hazardous Air Pollutants (NESHAPs) and begins on pdf page 141 (permit page 137), with each rule included as attachments B-R to the permit
- Attachment A is the fugitive dust control plan, which begins on pdf page 227

IDEM has also included a technical support document (TSD) on PDF page 919. This document describes IDEM's rationale for the decision it is proposing in the draft permit. The TSD identifies all emissions units, describes all requirements that each emissions unit will and will not be subject to, and also justifies the proposed monitoring, recordkeeping, and reporting requirements included in the permit that the source will use to determine compliance with each permit condition.

Several additional appendices provide further justification and support for IDEMs decision. You can find the various appendices on the following pages.

- TSD Appendix A: Emissions Calculations. PDF page 1031. This appendix includes calculations and emissions estimates for the various emissions units at the proposed source.
- TSD Appendix B: Best Available Control Technology (BACT) Analysis. PDF page 1074. Appendix B includes IDEM's BACT analysis which it uses to determine the level of control required by the Prevention of Significant Deterioration (PSD) permit. IDEM incorporates its BACT determination into the permit, generally Section D of the permit.
- Air Quality Analysis. PSD page 1206. The air quality analysis includes IDEM's evaluation of the proposed source's ambient impact for several pollutants. It describes the methodology used in the analysis and provides modeled results.

Please feel free to call or email me if you have any further questions. I have copied my colleague (Paymon Danesh) and my supervisor (Genevieve Damico) on this email in case you have further questions and I am not available to assist.

Thanks,
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